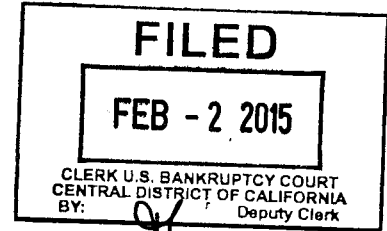


ORIGINAL



1 Ilangovan Kuppusamy
2 Ranjani Ilangovan Krishnan
3 5371 Strasbourg Ave
4 Irvine, CA 93604
5 (310) 897-7555

6 Debtors

7 **UNITED STATES BANKRUPTCY COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **SANTA ANA DIVISION**

10 In Re: Ilangovan Kuppusamy, and) Case No. : 8:14-bk-17399-CB
11 Ranjani Ilangovan Krishnan,) Chapter 7
12 Debtors,) Filed: December 26, 2014
13) **DEBTORS' MOTION FOR AN ORDER OF**
14) **PROTECTION**
15)

16 COME NOW, Debtors, and hereby move the Court to enter an order
17 of protection from harassment for the following reasons.

18 1. This petition under Chapter 7 was filed in the name of
19 Debtors.

20 2. Section 341 creditors' meeting is scheduled for February 3,
21 2015.

22 On January 29, 2015 at about 10:54 PM, Morgan Callanan a
23 person who formerly worked for Dr Kuppusamy, came to Dr
24 Kuppusamy's home, knocked the door, and when the door was
25 opened, told Dr Kuppusamy that he was asked to appear at the
26
27
28

1 Section 341 meeting of the creditors. See Kuppusamy Aff.,
2 at ¶¶ 2-4.

3 3. Later Dr Kuppusamy found a note on his door which states:

4 ILAN

5 CALL MORGAN

6 760-213-7485

7 COURT CASE NEXT WEEK.
8

9
10 LET'S MEET # BK. CASE. SANTA ANNA [sic]

11 See Kuppusamy Aff., at ¶ 5.

12 4. On January 30, 2015 between about 9:46 and 9:47 PM, William
13

14 A. Kent, former attorney for the Debtors, was seen heavily
15 knocking the door of the Debtors' residence. The Debtors
16 called the police and an officer appeared. See Kuppusamy
17 Aff., at ¶ 6.

18 5. The officer, called Mr. Kent and told Mr. Kent that he was
19 no longer the Debtors' attorney. Debtors filed a report with
20 the Irvine Police Department describing the two incidents.
21 See Kuppusamy Aff., at ¶ 6.

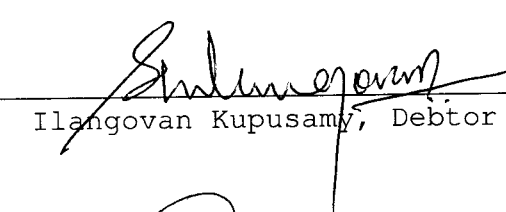
22 6. On January 30, 2015, upon learning of the threats by Morgan
23 Callanan, Dr Kuppusamy's counsel called Mr. Callanan, who
24 asked Debtor's counsel not to help the Debtors, and later
25 threatened the Debtor's counsel, who denied any knowledge.
26 See Kuppusamy Aff., at ¶¶ 9-11.
27
28

1 7. These incidents made the Debtors fearful for their lives.

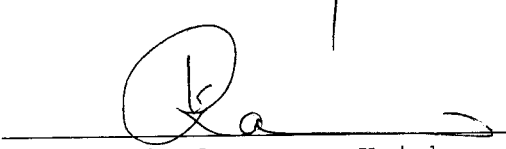
2 8. WHEREFORE, debtors pray for an order of protection from
3 threats and intimidation.

4 Respectfully submitted,

5
6
7 DATED: February 2, 2015


Ilangovan Kupusamy, Debtor

8
9
10 DATED: February 2, 2015


Ranjani Ilangovan Krishnan, Debtor

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled (*specify*): _____
DEBTORS' MOTION FOR AN ORDER OF PROTECTION

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 02/02/2015, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Edward Hays, 870 Roosevelt, Irvine, CA 92620

Martin Greenbaum, 840 Newport Center Dr., Suite 720, Newport Beach, CA 92660

Peter B. Nagel, 999 Eighteenth Street, Suite 1745, Denver, Colorado 80202

William Lobel, 840 Newport Center Drive, Suite 750, Newport Beach, CA 92660

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 02/02/2015, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

US Trustee, Bankruptcy court, 411 W 4th ST. Room 9041, Santa Ana, CA 92701 (hand delivery)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

02/02/2015 Ilangovan Kuppasamy
Date Printed Name


Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.